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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

\* \* \* \* \*

THE LAW OFFICES OF CHAD M. GOLIGHTLY, LTD.

Plaintiff,

vs.

ONEYDY MORALES, an individual; UNIVERSITY  
MEDICAL CENTER; AUXILIARY OF RIVERSIDE  
COMMUNITY HOSPITAL; AMERICAN MEDICAL  
RESPONSE OF SOUTHERN CALIFORNIA;  
MARK GLYMAN, M.D., D.D.S. AND ERIC D.  
SWANSON, M.D., D.M.D. LIMITED; SOUTHERN  
HILLS MEDICAL CENTER, LLC; UNITE HERE  
HEALTH, a foreign corporation; American Medical  
Response of Southern California dba American Medical  
Response, a foreign corporation; DOES I through X; ROE  
CORPORATIONS XI through XX;

Defendants.

Case: 2:15-cv-01589-JAD-PAL

**UNITE HERE HEALTH'S  
STATEMENT REGARDING  
REMOVED ACTION**

Consistent with the Court's Minute Order [Doc. 3] entered on August 19, 2015,  
Defendant UNITE HERE HEALTH ("UHH") respectfully submits this Statement Regarding  
Removed Action:

1. **The date(s) on which you were served with a copy of the Complaint in the removed action:** A copy of the Amended Complaint in Interpleader was first received by UHH representatives on August 3, 2015.
2. **The date(s) on which you were served with a copy of the Summons:** August 3, 2015.

- 1       3. **In removals based on diversity jurisdiction, the names of any served defendants who**  
2       **are citizens of Nevada, the citizenship of the other parties and a summary of**  
3       **defendant's evidence of the amount in controversy:** The removal of this case was not  
4       based on diversity jurisdiction.
- 5       4. **If your Notice of Removal was filed more than thirty (30) days after you first**  
6       **received a copy of the Summons and Complaint, the reason removal has taken place**  
7       **at this time and the date you first received a paper identifying the basis for removal:**  
8       The Notice of Removal was filed within thirty (30) days after UHH first received a copy  
9       of the Summons and Complaint.
- 10      5. **In actions removed on the basis of the court's jurisdiction in which the action in**  
11      **state court was commenced more than one year before the date of removal, the**  
12      **reasons this action should not summarily be remanded to the state court:** This  
13      action was commenced in state court less than one year before the date of removal.
- 14      6. **The name(s) of any defendant(s) known to have been served before you filed the**  
15      **Notice of Removal who did not formally join in the Notice of Removal and the**  
16      **reasons they did not:** UHH presently has no information indicating whether any other  
17      Defendant was served before the Notice of Removal was filed in this Court.


18      Dated this August 19, 2015.

CHRISTENSEN JAMES & MARTIN

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20      By: /s/ Daryl E. Martin  
21      Daryl E. Martin, Esq.  
22      7440 W. Sahara Ave.  
23      Las Vegas, Nevada 89117  
24      Attorneys for UNITE HERE HEALTH  
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26  
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# CERTIFICATE OF SERVICE

I am over the age of 18, I am employed by and am readily familiar with the practices of Christensen James & Martin (“Firm”). On the date of filing of the foregoing papers with the Clerk of Court the Firm caused a true and correct file-stamped copy of the STATEMENT REGARDING REMOVED ACTION to be served in the following manner:

 ELECTRONIC SERVICE: Pursuant to LR 5-4 of the United States District Court for the District of Nevada, the above-referenced document was electronically filed and served on all parties through the Notice of Electronic Filing automatically generated by the Court.

☐ UNITED STATES MAIL: By depositing a true and correct copy of the above-referenced document into the United States Mail with prepaid first-class postage, addressed to counsel for the Plaintiff:

☐ OVERNIGHT COURIER: By depositing a true and correct copy of the above-referenced document for overnight deliver via a nationally-recognized courier, addressed to the parties listed on the attached service list at their last-known mailing address.

☐ FACSIMILE: By sending the above-referenced document via facsimile to those persons listed on the attached service list and with the set forth facsimile numbers.

CHRISTENSEN JAMES &amp; MARTIN

By: /s/ Natalie Saville